

Hearing Date: July 7, 2016 at 2:00 p.m. ET

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*Proposed Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11  
:  
Gawker Media LLC, *et al.*,<sup>1</sup> : Case No. 16-11700 (SMB)  
:  
Debtors. : (Jointly Administered)  
:  
:  
Related Pleading: Dkt Nos. 19, 38  
:  
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**NOTICE OF FILING OF PROPOSED FINAL ORDER PURSUANT TO SECTIONS 105,  
361, 362, 363, AND 364 OF THE BANKRUPTCY CODE AND RULES 2002, 4001, AND  
9014 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE (I)  
AUTHORIZING INCURRENCE BY THE DEBTORS OF POSTPETITION SECURED  
INDEBTEDNESS, (II) GRANTING LIENS, (III) AUTHORIZING USE OF CASH  
COLLATERAL BY THE DEBTORS AND PROVIDING FOR ADEQUATE  
PROTECTION, AND (IV) MODIFYING THE AUTOMATIC STAY**

**PLEASE TAKE NOTICE** that on June 13, 2016, Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Kinja Kft. (“Kinja”), debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed the *Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362,*

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<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.’s offices are located at Andrassy ut 66. 1062 Budapest, Hungary.

*363 and 364 and Rules 2002, 4001, and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing Incurrence by the Debtors of Postpetition Secured Indebtedness, (II) Granting Liens, (III) Authorizing Use of Cash Collateral by the Debtors and Providing for Adequate Protection, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing [Docket No. 19] (the “Motion”).<sup>2</sup>*

**PLEASE TAKE FURTHER NOTICE** that on June 16, 2016, the Court entered the *Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 364 and Rules 2002, 4001, and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing Incurrence by the Debtors of Postpetition Secured Indebtedness, (II) Granting Liens, (III) Authorizing Use of Cash Collateral by the Debtors and Providing for Adequate Protection, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing [Docket No. 38] (the “Interim Order”).*

**PLEASE TAKE FURTHER NOTICE** that the deadline to object to the relief set forth in the Motion on a final basis was July 1, 2016. To date, no objections have been filed in respect of the Motion.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as Exhibit A is a proposed final order approving the Motion on a final basis (the “Proposed Final Order”). The Debtors believe that the Proposed Final Order is in a form agreed to among the Debtors, the DIP Secured Parties, the Prepetition Second Lien Lender, and the Committee.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as Exhibit B is a redline comparison of the Proposed Final Order against the Interim Order.

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<sup>2</sup> Capitalized terms used but not otherwise defined in this Notice have the meanings ascribed to such terms in the Proposed Final Order.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as Exhibit C is a copy of the DIP Financing Agreement, which incorporates that certain First Amendment to Financing Agreement dated as of June 16, 2016.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as Exhibit D is a redline comparison of the DIP Financing Agreement against the original DIP Financing Agreement filed as Exhibit B to the Motion.

**PLEASE TAKE FURTHER NOTICE** that the parties entitled to notice of the Motion shall be served with this Notice.

Dated: July 5, 2016  
New York, New York

/s/ Gregg M. Galardi  
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